

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ANGELA READING,

Plaintiff,

v.

ROBERT DUFF, *et al.*,

Defendants.

HON. KAREN M. WILLIAMS, U.S.D.J.

HON. SHARON A. KING, U.S.M.J.

Civil Action No. 23-1469

**CONSENT ORDER TO IMPLEMENT MANDATE, LIFT STAY,
AND SET BRIEFING SCHEDULE**

WHEREAS on June 24, 2024, Plaintiff Angela Reading filed a motion for leave to file a Second Amended Complaint; and

WHEREAS on June 25, 2024, this Court stayed all proceedings in this action pending the resolution of Plaintiff's interlocutory appeal of the Court's order denying her motion for a preliminary injunction; and

WHEREAS on December 20, 2024, the U.S. Court of Appeals for the Third Circuit issued an opinion and judgment affirming this Court's order and taxing costs against Plaintiff; and

WHEREAS on February 11, 2025, the Third Circuit's Mandate was entered in this Court, ECF No. 119; and

WHEREAS Plaintiff has shared her proposed revised Second Amended Complaint with Defendants, and Defendants consent to its filing including the addition of new factual allegations, new claims, and three new defendants; and

WHEREAS the three proposed new defendants are the Secretary of the Department of Homeland Security (DHS), the Administrator of the Transportation Security Administration (TSA), and the Director of the New Jersey Office of Homeland Security and Preparedness (NJOHSP), in their official capacities; and

WHEREAS under Federal Rule of Civil Procedure 15(a)(2) an amended complaint can be filed with consent of the opposing parties, and under Federal Rule of Civil Procedure 21, on motion or on its own, the Court may at any time, on just terms, add parties; and

WHEREAS the parties have conferred and agreed to a schedule with respect to Plaintiff Angela Reading's revised proposed Second Amended Complaint, the addition of new parties, and Defendants' anticipated motions to dismiss;

IT IS on this 26th day of February, 2025:

ORDERED pursuant to Local Civil Rule 79.4 and the Third Circuit's Mandate that costs in the amount of \$76.77 are taxed against Plaintiff and in favor of Defendant Helen Payne; and it is further

ORDERED that the stay of proceedings is lifted; and it is further

ORDERED that on just terms the new defendants are hereby added as parties; and it is further

ORDERED that Plaintiff may file a Second Amended Complaint within two weeks from the date of this Order; and it is further

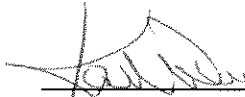
ORDERED that Plaintiff will timely serve the new defendants; and it is

further

ORDERED that Defendants and the new defendants will answer or move to dismiss the Second Amended Complaint by the latest date allowed for any Defendant or new defendant under applicable rules including Federal Rules of Civil Procedure 15(a)(3) and 12(a) and in any event all parties have at least 30 days after filing of the Second Amended Complaint to answer or move to dismiss; and it is further

ORDERED that Plaintiff may file an opposition within thirty (30) days from the latest date a motion to dismiss is filed; and it is further

ORDERED that Defendants and new defendants may file a reply within fifteen (15) days from the date Plaintiff's opposition is filed.



HON. KAREN M. WILLIAMS
UNITED STATES DISTRICT JUDGE

Date:

January 26, 2025
At Camden, New Jersey

We hereby consent to the form and
entry of the within Consent Order.

THOMAS MORE SOCIETY

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Acting United States Attorney

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Individual Capacity